

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x:		
AURELIUS CAPITAL PARTNERS, LP	:	
and AURELIUS CAPITAL MASTER, LTD.,	:	
	:	No. 07 Civ. 2715 (TPG)
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	

-----x:		
AURELIUS CAPITAL PARTNERS, LP	:	
and AURELIUS CAPITAL MASTER, LTD.,	:	
	:	No. 07 Civ. 11327 (TPG)
Plaintiffs,	:	
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	

-----x:		
BLUE ANGEL CAPITAL I LLC,	:	
	:	
Plaintiff,	:	No. 07 Civ. 2693 (TPG)
	:	
- against -	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	

-----x: (Captions continue on following pages)

**DECLARATION OF DANIEL B. RAPPORT IN FURTHER
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL
PRODUCTION FROM DEFENDANT AND NON-PARTY
BANKS AND IN OPPOSITION TO CERTAIN NON-PARTY
BANKS' CROSS-MOTIONS TO QUASH, MODIFY OR FOR
A PROTECTIVE ORDER**

-----X:	
AURELIUS CAPITAL MASTER, LTD. and	:
ACP MASTER, LTD.,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X:	
AURELIUS CAPITAL MASTER, LTD. and	:
ACP MASTER, LTD.,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X:	
AURELIUS OPPORTUNITIES FUND II, LLC	:
and AURELIUS CAPITAL MASTER, LTD.,	:
	:
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X:	

No. 09 Civ. 8757 (TPG)

No. 09 Civ. 10620 (TPG)

No. 10 Civ. 1602 (TPG)

-----X:	
AURELIUS OPPORTUNITIES FUND II, LLC	:
and AURELIUS CAPITAL MASTER, LTD.,	:
	: No. 10 Civ. 3507 (TPG)
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X:	
AURELIUS CAPITAL MASTER, LTD. and	:
AURELIUS OPPORTUNITIES FUND II, LLC,	:
	: No. 10 Civ. 3970 (TPG)
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X:	
BLUE ANGEL CAPITAL I LLC,	:
	:
Plaintiff,	: No. 10 Civ. 4101 (TPG)
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X:	

-----X:	
BLUE ANGEL CAPITAL I LLC,	:
	:
Plaintiff,	: No. 10 Civ. 4782 (TPG)
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
	:
-----X:	
AURELIUS CAPITAL MASTER, LTD. and	:
AURELIUS OPPORTUNITIES FUND II, LLC,	:
	: No. 10 Civ. 8339 (TPG)
Plaintiffs,	:
	:
- against -	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
-----X:	

I, Daniel B. Rapport, declare as follows:

1. I am a partner in the law firm of Friedman Kaplan Seiler & Adelman LLP, counsel to Plaintiffs Aurelius Capital Partners, LP, Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund II, LLC and Blue Angel Capital I LLC (collectively “Plaintiffs”). I make this Declaration to put before this Court certain documents related to Plaintiffs’ Motion to Compel Production from Defendant and Non-Party Banks and in opposition to certain Non-Party Banks’ Motions to Quash, Modify or for a Protective Order. The attached documents were assembled either by me or by persons working at my direction.

2. Attached to this Declaration as Exhibits A-I are true and correct copies of the following documents:

<u>Ex.</u>	<u>Document</u>
A	October 15, 2012 Emails between Mark Sullivan and counsel for Plaintiffs;
B	October 23, 2012 Letter from Emily Stubbs to counsel for all Banks;
C	November 7, 2012 Email from Shari Alexander to counsel for Plaintiffs (on behalf of all Banks);
D	March 26, 2012 Transcript of Proceedings, NML Capital Ltd. v. The Republic of Argentina, No. 03 Civ. 8845 (TPG);
E	Law No. 24156, October 26, 1992, Administración Financiera y De Los Sistemas De Control Del Sector Publico Nacional (with translation of selected provisions);
F	Decree No. 1382/2012, August 9, 2012, Administración Publica Nacional (with translation);
G	Decree No. 1344/2007, October 4, 2007, Administración Financiera y De Los Sistemas De Control Del Sector Publico Nacional (with translation of selected provisions);

- H Constitution of the Argentine Nation;
- I January 10, 2005 Prospectus Supplement to the 2005 Exchange Offer (excerpt);
- J April 28, 2010 Prospectus Supplement to the 2010 Exchange Offer (excerpt);
- K Exhibit 1 (Revised May 27, 2013) to the Document Requests served on the Republic, dated December 13, 2011, and the Subpoenas served on the Banks, dated December 13, 2011 and January 12, 2012.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed in New York, NY
on this 27th day of May 2013

/s/ Daniel B. Rapport

Daniel B. Rapport